

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

VETERAN MEDICAL PRODUCTS, INC.,	)	
a Michigan corporation, TILLMAN	)	
INDUSTRIES, INC., a Michigan corporation,	)	
and JOSEPH SZYPERSKI, PATRICK EDDY,	)	Civil No. 1:05-CV-0655
JOHN KOTWICK, MARK LONGCORE, and	)	
RYAN HEIDENFELD, individually,	)	Hon. Gordon J. Quist
	)	U.S. District Judge
Plaintiffs,	)	
	)	
v.	)	
	)	
BIONIX DEVELOPMENT CORPORATION	)	
and ANDREW J. MILLIGAN,	)	
	)	
Defendants.	)	
	)	

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**PLAINTIFFS' REPLY TO DEFENDANTS' COUNTERCLAIM**

39. Plaintiffs admit that United States Design Patent No. 423,669 was issued on April 25, 2000, and that a copy was attached to Defendants' Answer as Exhibit A. The remaining allegations of Paragraph 39 are denied.

40. Denied.

41. Denied.

42. Admitted that copies of literature are attached as Exhibit B and that printouts of one of the Plaintiffs' websites is attached as Exhibit C. The remaining allegations of Paragraph 42 are denied.

43. Denied.

44. Denied.

45. Denied.

- 46. Plaintiffs incorporate by reference their answers to Paragraphs 39-45.
- 47. Denied.
- 48. Denied.
- 49. Plaintiffs incorporate by reference their answers to Paragraphs 39-48.
- 50. Denied.

Respectfully submitted,

Dated: November 3, 2006

/s/ Eugene J. Rath III

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